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STATE OF COLORADO

00503 RF02

Bill Owens, Governor
Jane E. Norton, Executive Director

CONTROL

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Dedicated to protecting and improving the health and environment of the people of Colorado

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(303) 692-3090<http://www.cdphe.state.co.us>Colorado Department
of Public Health
and Environment

DIST.	LTR	ENC
BOGNAR, E.	X	
DECK, C. A.	X	
DEGENHART, K.		
DIETER, T. J.		
DIETERLE, S. E.		
FERRERA, D.W.		
FERRI, M.S.		
GERMAIN, A. L.		
GIACOMINI, J.		
ISOM, J. H.		
LONG, J. W.		
MARTINEZ, L.A.	X	
MCLAUGHLIN, J.	X	
NORTH, K.	X	
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RODGERS, A. D.		
SCOTT, G.K.		
SHELTON, D.C.	X	
SPEARS, M.S.		
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WILLIAMS, J. L.		
NININGER, R.	X	
CABLE, J.	X	
LANDRY, D.	X	

July 19, 2002

Mr. Joseph A Legare
Assistant Manager for Environment and Infrastructure
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: FINAL Surface Water Remedial Action Objectives Technical Memorandum

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division transmits the attached comments for incorporation into the Surface Water Technical Memorandum. CDPHE appreciates the time and effort placed on developing the technical memorandum and the consideration of CDPHE comments.

If you have any questions regarding this correspondence please contact me at (303) 692-3367, or Karen Holliway at 303-692-3377.

Sincerely,

Steven H. Gunderson
RFCA Project CoordinatorCOR. CONTROL X X
ADMN. RECORD X X
PATIS/130Reviewed for Addressee
Corres. Control RFP7/24/02
Date By

Ref. Ltr. #

DOE ORDER #

5400.1

Attachment

Cc: Tim Rehder, EPA
Scott Survochak, RFFO DOE
Dave Shelton, KH
Administrative Records Building T130GShirley Garcia, Broomfield
Al Nelson, Westminster
Melissa Anderson, RFCLOG
Jerry Henderson, RFCAB

ADMIN RECORD

SW-A-004534

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CDPHE Comments on the FINAL Surface Water Remedial Action Objectives Technical Memorandum

CDPHE would still like to see incorporation of the modifications to the Introduction provided to RFETs on June 14, 2002. Retain the Introduction and Objective format provided in the "Final", but modify as appropriate.

Specific modification requests –

Section 1, Introduction. Paragraph 2, 3rd and 4th sentence – Remove 3rd sentence "The RAOs are established for the purpose...". Revise 4th sentence to read "The FS provides an analysis of remedial action alternatives and how feasible it is for alternative (strikeout) remedial actions to meet these RAOs in relation to the nine CERCLA criteria for the final remedy selection."

Section 2, Objectives. Paragraph 1, 1st sentence. Modify the sentence to read: "This TM provides the proposed RAOs for surface water, which are consistent with RFCA."

Section 2, Objectives. Paragraph 1, 2nd sentence. Modify sentence to read: "Specifically, the TM identifies potential Contaminants of Concern (CoCs), and the methodology...including identification of potential Points of Compliance (POCs)."

Section 2, Objectives. Paragraph 1, 3rd sentence. Modify sentence to read: "These proposed RAOs are consistent with the CERCLA requirements."

Section 2, Objectives. Paragraph 1, 4th sentence. Modify sentence to read: "First, these RAOs specify the COCs for surface water."

Section 2, Objectives. Paragraph 2, 1st sentence. Modify sentence to read: "...whether these proposed RAOs continue to (strikeout - provide adequate protection) be protective of human health..."

Section 2, Objectives. Paragraph 3. Add a sentence at the beginning of this paragraph to read: "The purpose of this TM is only to establish proposed surface water RAOs to support the accelerated action process and for use in the RI/FS process."

Section 2, Objectives. Add for clarification at the end of the Objectives section the following:

The post-closure surface water program will be developed during the RI/FS process, taking into consideration impacts from other environmental media, accelerated actions resulting in modifications to the hydrologic system, and final remedy determination. The surface water program will be developed to protect surface water through performance monitoring and compliance evaluation.

Section 4.1, Points of Compliance. Add to the end of the section the following sentence: "For the RI/FS, these POCs will remain as identified in RFCA."

Section 4.1.1 and 4.1.2, Segment 5 and 4a/4b POCs. Replace the use of "at closure" with "for the RI/FS assessment." This TM is not for closure, but to support the completion of the accelerated actions and assessment process for during the RI/FS to determine what will be included as part of the program at closure.

Section 4.2, Contaminants of Concern. Replace the use of the term "at closure" with "during the RI/FS process."

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